

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

Case No. 2:22-cv-00642-JPS

PREPARED FOOD PHOTOS, INC. f/k/a
ADLIFE MARKETING &
COMMUNICATIONS CO., INC.,

Plaintiff,

v.

NOFAL LLC d/b/a FOOD TOWN MART and
SHARIF JABER,

Defendants.

DECLARATION OF REBECCA JONES

Rebecca Jones does hereby declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and otherwise competent to testify. I make the following statements based on personal knowledge.
2. I am the Secretary of plaintiff Prepared Food Photos, Inc. f/k/a Adlife Marketing & Communications Co., Inc. ("Plaintiff").
3. Plaintiff is in the business of licensing high-end, professional photographs for the food industry. Importantly, Plaintiff is the sole content provider to its sister company, Bad-Adz Digital, and its customers rely on Plaintiff's photographic library in creating their own grocery ads/other advertisements.
4. Plaintiff's library of photographs was created over a 15 – 20-year period of time.
5. In November 2021, Plaintiff discovered one of its copyrighted photographs (of pork chops) displayed on the "Food Town Mart" Facebook page being used to advertise an apparent

sale by such store.

6. Upon discovery, Plaintiff requested that its outside counsel (CopyCat Legal PLLC) send a pre-suit demand letter to the store in hopes that a letter from a law firm would not be ignored.

7. On January 20, 2022, our counsel (CopyCat Legal PLLC) spoke to Sharif Jaber telephonically who denied that the Facebook page had any connection to his store. Based on what appeared to be a misrepresentation by Mr. Jaber, Plaintiff directed its counsel to file this lawsuit.

8. It is my understanding that the photograph remained displayed on the Facebook page until sometime after this lawsuit was filed (i.e., at least 4 months after counsel had spoken to Mr. Jaber).

9. Given Defendants' denial that the Facebook page was controlled by them and the fact that the subject photograph remained on the Facebook page, Plaintiff was left with little choice but to pursue this lawsuit or drop the matter altogether.

10. Jaber speculates in his Motion that Plaintiff's motive in filing this lawsuit and others is purely financial and/or to force parties into disproportionate settlements. This is grossly inaccurate.

11. In filing this lawsuit and others, Plaintiff is motivated by the need to protect its intellectual property for the benefit of its paying customers and to prevent infringers (such as Nofal LLC) from claiming that Plaintiff has somehow waived its rights by not pursuing infringers. This is especially true where infringers (such as Nofal LLC) refuse to remove Plaintiff's intellectual property from their websites/social media notwithstanding multiple demands for such.

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct.

DATED: 7/30/2025.


ID rVpXz4kCV7TB8fTkKngTi55K

Rebecca Jones

eSignature Details

Signer ID:	rVpXz4kCV7TB8fTkKngTi55K
Signed by:	Rebecca Jones
Sent to email:	rebecca@preparedfoodphotos.com
IP Address:	96.238.9.54
Signed at:	Jul 30 2025, 12:17 pm PDT